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*Attorneys for General Motors LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X
<b>In re</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>, f/k/a General Motors Corp., <i>et al.</i></b>	:
	:
<b>Debtors.</b>	:
	:

**GENERAL MOTORS LLC'S COUNTER-DESIGNATION  
OF ADDITIONAL ITEMS TO BE INCLUDED IN THE RECORD ON  
APPEAL REGARDING THE APPEALS OF THE BANKRUPTCY  
COURT'S NOVEMBER 9, 2015 DECISION [DKT. NO. 13534] AND  
THE DECEMBER 4, 2015 JUDGMENT [DKT. NO. 13563]**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), General Motors LLC ("New GM") submits this counter-designation of additional items to be included in the record on appeal in connection with the appeals of the *Decision on Imputation, Punitive Damages, and Other No-Strike and No-Dismissal Pleadings Issues*, dated November 9, 2015 [ECF No. 13533, as corrected ECF No. 13534] (the "Decision") and the *Judgment*, dated December 4, 2015 [ECF No. 13563] (the "Judgment").

**COUNTER-DESIGNATION OF RECORD**

In addition to the items designated by Appellants in their Statements of Issues on Appeal and Designations of Record on Appeal [ECF Nos. 13576, 13578 and 13579],<sup>1</sup> New GM submits the following designation of additional items to be included in the record on appeal of the Decision and Judgment (including any exhibit, annex, appendix or addendum thereto):

<u>Item No.</u>	<u>Date Filed</u>	<u>Description</u>	<u>Docket No.</u>
1.	7/08/09	Transcript regarding Hearing Held on 7/2/09 9:02 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	3062
2.	7/08/09	Transcript regarding Hearing Held on 6/30/09 10:07 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	3087
3.	7/15/09	Transcript regarding Hearing Held on 7/1/09 7:59 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing	3205
4.	9/02/09	Debtors' Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof	3940

<sup>1</sup> The Appellants in this matter are (i) the Ignition Switch Plaintiffs [Dkt. No. 13576], (ii) certain plaintiffs represented by Gary Peller, Esq. [Dkt. No. 13578], and (iii) Hilliard Muñoz Gonzales LLP and Thomas J. Henry Injury Attorneys, as counsel for the Adams Plaintiffs [Dkt. No. 13579].

5.	8/01/14	Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	12807
6.	9/15/14	Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits	12897
7.	11/05/14	Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	12981
8.	12/16/14	Responsive Brief of Designated Counsel for Pre-Closing Accident Plaintiffs on Threshold Issues Concerning New GM's Motions to Enforce the Sale Order and Injunction	13021
9.	1/16/15	Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction	13048
10.	2/20/15	Transcript Regarding Hearing Held on 2/18/2015 9:00 AM Regarding Oral Argument on Motion to Enforce	13096
11.	7/14/15	Transcript Regarding Hearing Held on 2/17/2015 9:00 AM Regarding Oral Argument on Motion to Enforce	13299-2
12.	9/25/15	New GM MDL Complaint Letter, with Marked MDL Complaint, Pursuant to Scheduling Order dated September 3, 2015	13469
13.	10/09/15	Response to New GM's Marked MDL Complaint & Explanatory Letter	13495
14.	10/15/15	Transcript Regarding Hearing Held on Wednesday, October 14, 2015 at 9:46 AM RE: Scheduling Order Signed on 9/3/2015 Regarding Case Management Order Re: No-Strike, No Stay, Objection, and GUC Trust Asset Pleading, <i>etc.</i>	13508

Dated: New York, New York  
January 11, 2016

Respectfully submitted,

/s/ Arthur Steinberg  
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